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Jaime M. Crowe (Va. Bar No. 37186)

*Counsel for Non-parties Toshiba Corporation and
Toshiba America Electronic Components, Inc.*

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

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In re:	:	
	:	Case No. 08-35653 (KRH)
CIRCUIT CITY STORES, INC., <u>et al.</u> ,	:	
	:	Chapter 11
	:	
	:	(Jointly Administered)
Debtors.	:	
	:	
-----X	:	

MOTION FOR ADMISSION *PRO HAC VICE*

Jaime M. Crowe hereby moves the Court, pursuant to Local Bankruptcy Rule 2009-1(E), to enter an order authorizing Charise Naifeh from the law firm of White & Case LLP to appear and represent Toshiba Corporation and Toshiba America Electronic Components, Inc. (the "Toshiba Entities") *pro hac vice* in the above-referenced bankruptcy case and any related adversary litigation.

In support of this Motion, I state as follows:

1. I am a member in good standing of the Bar of the Commonwealth of Virginia and an attorney admitted to practice before the United States Bankruptcy Court for the Eastern District of Virginia. I will be associated with Ms. Naifeh in this matter.

2. Ms. Naifeh is a member of good standing of the State Bar of New York and the District of Columbia Bar. There are no disciplinary proceedings pending against Ms. Naifeh in any jurisdiction in which she is admitted to practice.

3. Ms. Naifeh has the following business address:

Charise Naifeh
White & Case, LLP
701 13th Street, NW
Washington, DC 20005

4. Ms. Naifeh has completed an Application to Qualify as a Foreign Attorney Under Local Bankruptcy Rule 2090-1(E)(2), a copy of which is attached hereto as Exhibit A.

5. A proposed order granting the relief requested in this Motion is attached hereto as Exhibit B.

6. Ms. Naifeh understands that *pro hac vice* admission does not constitute formal admission to the bar of the United States Bankruptcy Court for the Eastern District of Virginia.

WHEREFORE, Movant respectfully requests that this Court grant his Motion to permit Charise Naifeh to represent the Toshiba Entities *pro hac vice* in this case and for such other and further relief as this Court deems just and proper.

Dated: August 12, 2016

Respectfully Submitted,

/s/ Jaime M. Crowe
Jaime M. Crowe (Va. Bar No. 37186)
WHITE & CASE LLP
701 Thirteenth Street, NW
Washington, DC 20005
(202) 626-3600

*Counsel for Non-parties Toshiba Corporation and
Toshiba America Electronic Components, Inc.*

Certificate of Service

I hereby certify that on the 12th day of August 2016, a true and correct of *MOTION TO ADMIT PRO HAC VICE* was filed using the Court's CM/ECF service, and served electronically on all interested parties by ECF notification from the Court.

_____/s/ Jaime M. Crowe